

EXHIBIT A

The Honorable Benjamin H. Settle

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

THERESA SHORTMAN, individually and as
the representative of a class of similarly-situated
persons,

Plaintiff,

v.

PRESS GANEY ASSOCIATES LLC, an Indiana
Limited Liability Company,

Defendant.

No. 3:20-cv-05410-BHS

DEFENDANT PRESS GANEY
ASSOCIATES LLC'S OFFER OF
JUDGMENT PURSUANT TO
FEDERAL RULE OF CIVIL
PROCEDURE 68

TO: PLAINTIFF THERESA SHORTMAN AND HER ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE THAT Defendant Press Ganey Associates LLC ("Defendant")
hereby offers to allow entry of judgment to be taken against it pursuant to Rule 68 of the Federal
Rules of Civil Procedure, as follows: a judgment in favor of Plaintiff Theresa Shortman
("Plaintiff") and against Defendant, in the sum of \$650.00 (six hundred fifty dollars). This shall
be the total amount to be paid by Defendant on account of any and all liability claimed in this
action, including all costs of suit and attorney's fees otherwise recoverable in this action by
Plaintiff, as well as any claimed interest. This offer of judgment is intended to resolve all of
Plaintiff's claims in this action, including without limitation any and all claims for compensatory
damages, statutory damages, attorneys' fees, litigation expenses, and costs of suit.

OFFER OF JUDGMENT
(3:20-cv-05410-BHS)

1 This offer of judgment shall not be filed with the Court unless (a) accepted or (b) in a
2 proceeding to determine the reasonableness hereof.

3 If Plaintiff does not accept this offer, she may become obligated to pay Defendant's costs
4 incurred after the making of this offer in the event that Plaintiff does not recover a judgment that
5 is more favorable than this offer of judgment pursuant to Rule 68(d) of the Federal Rules of Civil
6 Procedure.

7 To accept this offer, Plaintiff must serve written notice of acceptance thereof within
8 fourteen (14) days of the date this offer is made.

9 This offer is not to be construed in any way as an admission of liability by the Defendant
10 or that Plaintiff has suffered any damage, but rather is made solely for the purpose of
11 compromising a disputed claim.

12 DATED this 17th day of August, 2020.

13 By s/ Kenneth E. Payson

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